

DECLARATION OF MARIO ARMANDO LAVANDEIRA, JR. IN SUPPORT OF MOTION TO

SEAL OR REDACT PERSONAL INFORMATION

Lively v. Wayfarer Studios LLC - Case No. 1:24-cv-10049

I, Mario Armando Lavandeira, Jr., declare as follows:

1. I am representing myself in this matter and am competent to make this declaration.
2. I am a public figure, widely known by the professional name "Perez Hilton," and have maintained a prominent digital presence for over two decades.
3. Due to the nature of my work and public status, I have regularly been the target of online harassment, threats, and unwanted intrusions.
4. I am the father of three young children. Their safety and that of my elderly mother, who resides with us, is my highest priority.
5. I recently became aware that Plaintiff's counsel filed a document (Docket Entry 440) that publicly disclosed identifying information of another individual - Cynthia Barnes Slater - who had not yet been successfully served.
6. I am seriously concerned that my residential address, phone number, or email address could similarly be disclosed, particularly given the global media attention surrounding this case and the constant social media activity about it.
7. I reached out to Plaintiff's counsel in good faith and offered to accept service of the subpoena via email, to avoid any unnecessary and potentially dangerous public disclosure.
8. I respectfully ask this Court to protect my personal information and, by extension, the safety and privacy of my children and elderly mother. This is a modest, reasonable, and justified request.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on: July 19, 2025

At: Las Vegas, Nevada

Mario Armando Lavandeira, Jr.